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From: Sewell, Jason

To: Jon.Schroeder@atlanticrelocation.com; j.mercurio@erllc.com

Copy To: Timothy.Swickard@lewisbrisbois.com; DCAGE@idem.IN.gov; Jason.LeMaster@hamiltoncounty.in.gov;

Barton, Kasey

Delivered Date: 03/20/2015 05:54 PM EDT

Subject: RE: Subsurface Investigation - Fishers, Indiana Site

Attachment: scan.pdf [771 KB]

Mr. Schroeder,

Thanks for sharing the subsurface investigation plans with IDEM and myself. Per our discussion, I also shared the plan with Hamilton County Health Department (cc'd here).

We each reviewed the plans, our comments are:

- -ERM should investigate all buried utilities near the aboveground storage tank (AST) that may serve as preferential subsurface pathways for oil to discharge. There are at least three utilities with visible structures at the ground surface. But there is the possibility for additional buried utilities. Utilities may include:
 - +The buried power supply to the AST dispenser;
 - +A buried water line ending at a water nozzle approximately ten feet east of the AST;
- +The buried storm water sewer involved in this oil discharge (ER/START have documented oil entering Atlantic storm drain catch basins 1 and 2 from the subsurface);
- +A possible buried utility (no visible structures) approximately 15-20 feet west of the AST (Josh Randall, START, can demonstrate where); and
- +A possible subsurface drain running due north off Atlantic property as described to us by Brent Cashman, Fishers storm sewer utilities. <u>cashmanb@fishers.in.us</u>
- -We were wondering what the rationale was behind soil boring only to ten feet depth. Ten feet may not reach depth to groundwater and therefore not allow the assessment of groundwater. We request amending plans to push at least one probe near the AST to the depth to groundwater (true groundwater, not perched water) or to the limits of the push probe (more like 30 feet, give or take and depending on subsurface soil conditions).
- -We suspect there could be an old underground storage tank (UST) under the present location of your aboveground storage tank (AST). A UST could be a source of oil to the subsurface and storm water drains. ERM should determine whether a UST is present on the property; they may be able to do this

with the same tools they were already bringing to the Site (including ground penetrating radar, other). If a UST is present, they should amend plans accordingly to assess the potential for a release from the UST in addition to the AST. Amendments should include push probing more than one probe location to depths deeper than the bottom of the UST. ERM can suggest additional appropriate changes; we'd like to see changes to plans in advance of performing the work.

Thanks, Jason Sewell On-Scene Coordinator U.S. EPA Region 5 Emergency Response 317-517-6987



Report to the National Response Center at:

-800-424-8802, or

-www.nrc.uscg.mil.

From: Jon Schroeder [mailto:Jon.Schroeder@atlanticrelocation.com]

Sent: Friday, March 20, 2015 9:49 AM

To: Sewell, Jason; CAGE, DAVID; James Mercurio

Cc: Swickard, Timothy

Subject: Subsurface Investigation - Fishers, Indiana Site

Here is the requested subsurface investigation plan. Jon Schroeder